



P.O. Box 1520 • Columbus, Georgia 31902-1520 • (706) 324-0338 • FAX (706) 596-4600

MUR 3774

September 11, 1995

Federal Election Commission  
OGC/Marty Lewis  
999 E Street, NW  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

SEP 15 11 49 AM '95

OGC/Marty Lewis:

The following information is in response to your letter received September 8, 1995, with reference to obtaining copies of documents in our possession pertaining to the political broadcasts aired by our radio station in October and November 1992 referencing Mr. Paul COVERDELL.

You will find our disclosure statement, political rate card for WRCG-AM as well as:

#### General Election 1992

- 1-Check number 1257 gross \$1510.40-Net \$1,283.84 from Media Solutions as agency for.
- 2-Customer Inquiry-Due to a move of our administrative offices the copy of all other forms are unavailable. Upon checking with GAB they stated we must retain our logs for three (3) years and payroll information for seven (7) years, all other items may be discarded as deemed necessary.
- 3-This was placed by Media Solutions through Christal Radio Group-Atlanta, GA. All forms were signed off by Agency for Candidate as agent for.

- 1-National Right to Life PAC paid for by National Right to Life Gross \$2,160. with a break out of check #2111-1080.00 and check #1737-\$1080.00.
- 2-Customer Inquiry-(see note above for other details.) this was not a political buy but an issue. Thus no discounts allowed.

ST 20 766 40 03



-2-

We do not retain production for this length of time.

Mr. Lewis, if I may be of future assistance to you, please do not hesitate to give me a call.

Sincerely,

Fran Malphrus-CRMC  
General Manager  
WRCG-AM

encl 7

cc

2020-04-30 15:07:16





P.O. Box 1520  
(404) 324-0338  
A CBS Radio Network Affiliate

**HOT HITS!**  
**WCGQ**  
**107.3 FM**

P.O. Box 1597  
(404) 327-1217

DATES POLITICAL RATES  
ARE IN EFFECT

\*JANUARY 25TH TO MARCH 10TH

\*ALABAMA APRIL 18TH TO JUNE 2ND  
(JUNE 30TH IF RUN-OFF)

\*GEORGIA JUNE 6TH TO JULY 21ST  
(AUGUST 11TH IF RUN-OFF)

\*GENERAL SEPTEMBER 4TH TO NOVEMBER 3RD

\*ALL VIABLE POLITICAL CANDIDATES ARE ELIGIBLE FOR THE "POLITICAL  
RATES" DURING THESE TIME PERIODS.





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### WCGQ AND WRCG POLITICAL ADVERTISING DISCLOSURE STATEMENT

The purpose of this Disclosure Statement is to make those parties who purchase political programming time fully aware of the application of the "lowest unit charge" provisions of Section 315(b) of the Communications Act. The lowest unit charge provisions apply only to legally qualified candidates for public office or their authorized campaign organizations to promote their candidacy; they are not applicable to political action committees or to non-candidate issue advertising.

#### Orders for Political Time

Orders for political time will not be considered firm until a completed and signed Agreement Form for Political Candidates (NAB Form PB-13) and the net cash advance payment have been received.

#### Proper Sponsor Identification

All adds must comply with the audio sponsorship identification requirements of the Communications Act. A pre-airing submission of all ads is requested to permit the station to verify compliance with the identification requirements. Should a candidate's ad not be submitted in sufficient time for a pre-airing review or not contain the proper identification, the station reserves the right to add the required material within the quantity of time purchased.

#### Type of Rates Offered by the Station

This station sells commercial time in thirty (30) second and sixty (60) second increments throughout the day. (See attached political rate cards.)

Spots are sold on a preemptible and non-preemptible (fixed) basis. (See attached political rate cards.)

Fixed Spot- Fixed spots will air in the program or time period purchased. These ads may not be preempted in favor of any other ad and will air as scheduled absent unforeseen program changes or technical difficulties.

Preemptible with Notice- Preemptible with notice spots will be preempted upon 2 days notice by any higher rated spot (either preemptible or fixed). If timely notice of preemption is not given, the spots become non-preemptible.

*24 HR*





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Immediately Preemptible without Make Good- Immediately preemptible without make good spots will be preempted up until the time of broadcast by any higher rated spot (either preemptible or fixed). A refund will be provided for preempted spots.

Spots are sold, for example, for a specific time and date or within a specific period. The attached sheet sets forth the specific time periods within which spot time may be purchased. Packages of spots of different classes or to be broadcast during different time periods are also sold. However, packages are treated as volume discounts and are considered in calculating the lowest unit charge.

#### Level of Rates Sold by the Station

Candidates are entitled to receive all discount privileges otherwise offered to commercial advertisers and are to be placed on a par with the most favored commercial advertiser of this station. Candidates will be charged the "lowest unit charge" (the "LUC" for the same class and amount of time for the same period during the forty-five (45) days preceding a general election. When a candidate purchases time outside these election periods, he or she will be charged rates comparable to current commercial rates.

The station has calculated the predicted LUC for every class of time sold on the station. The LUC may vary on a weekly basis depending upon the price of spots actually broadcast during each week. Candidates may purchase preemptible spots at the LUC or at a higher rate so as to decrease the potential for preemption. The station will supply the current or effective selling level (the "CSL") for all classes of time and time periods. The ESL is that level of rate which has a high degree of certainty of being broadcast on the station. Candidates are entitled to purchase preemptible spots at all interim levels of rates, subject to preemption by a higher rated spot.

At the end of each week, the station will audit the rates for all political time sold to insure that the rates charged candidates reflect the actual LUC, that is, the lowest rate any advertiser paid for the same class of spot that cleared during the same time period during the given week. Refunds will be issued for any overcharges.





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### Make Good Policy

In the event an immediately preemptible with make good spot is preempted, the station will make good the spot through placement in a comparable time period or periods to deliver an audience comparable to the spot purchased.

\*WCGQ-FM and WRCG-AM has, as a station policy, limiting all political advertising purchases to no more than (1) one unit per hour maximum.

\*30 minute and 1 hour "blocks" of time are available only on WRCG-AM.  
Rates available upon request!





po box 1520 □ columbus, georgia 31994 □ (404) 324-0338

WRCG-AM

CLASS OF TIME

#1 NON-PREEMPTIBLE GUARANTEED/FIXED POSITION

	<u>30'S</u>	<u>60'S</u>
6-10AM	\$22	\$28
10-3	\$18	\$24
3-7	\$22	\$28
7-MID	\$10	\$14
MID-6AM	\$6	\$10

#2 PRE-EMPTIBLE WITH MAKE-GOODS IN FLIGHT IN SAME TIME PERIODS WITH  
24 HOUR NOTICE.

	<u>30'S</u>	<u>60'S</u>
6-10AM	\$12	\$16.80
10-3	\$10	\$16.80
3-7	\$12	\$16.80
7-MID	\$8	\$10
MID-6AM	\$5	\$7

#3 IMMEDIATELY PRE-EMPTIBLE NO NOTICE NO MAKEGOODS. GUARANTEED IN SAME FLIGHT.

	<u>30'S</u>	<u>60'S</u>
6AM-MIDNIGHT	\$5	\$8

\*20% DISCOUNT FROM THESE RATES WHEN BUYING THE EXACT SAME SCHEDULE ON ~~WRCG-AM 1420~~. <sup>Fm WCGQ 107.3</sup>

\*THESE ARE GROSS RATES...CANDIDATES NOT USING AN AD AGENCY MAY DEDUCT 15% FROM THESE RATES. (SEE ATTACHED POLITICAL ADVERTISING DISCLOSURE STATEMENT)

\*PLEASE BE ADVISED THAT GRID #1 RATES ARE THE ONLY RATES THAT ARE GUARANTEED TO RUN WITHOUT ANY CHANCE OF PRE-EMPTION.



## Customer Inquiry

Customer Number: COVE0A	Credit Status.: A ACTIVE
Date Added.....: 11/20/92	Billing Cycle.: SBM
Advertiser Name: PAUL COVERDELL	Customer Type.: 2 NATIONAL/CHRIS
Customer Name...: MEDIA SOLUTIONS	SalesRep.....: 10 CHRISTAL
Address Line 1.: 422 BROADLAND RD	Product Code...: 90 POL/
Address Line 2.:	Finance Charge: None
City/St/Zip....: ATLANTA, GA 30342	Discount Taken: 15.00%
Contact/Phone...: CHRISTINE/404 237-5236	Affidavit Type: 3 D & T w/notary
Taxes: 1 -	2 -
	3 -

## Last Statement

## ++ Current ++

Prev Bal..	0.00	Sales.....:	0.00	0.00
Total A/R:	0.00	Payments.....:	0.00	0.00
0 - 30..:	0.00	Discounts.....:	0.00	0.00
31 - 60..:	0.00	Adjustments.....:	0.00	0.00
61 - 90..:	0.00	Finance Charges:	0.00	0.00
91 - 120..:	0.00	Sales Tax.....:	0.00	0.00
120 + ....:	0.00	Balance.....:	0.00	0.00
Date last Charge * Payment 11/24/92 * 11/27/92				

Press: P to Print Screen, F1 for History, Any Other Key to Continue.



## Customer Inquiry

Customer Number: COV000A	Credit Status.: A ACTIVE
Date Added.....: 11/17/92	Billing Cycle.: Calendar
Advertiser Name: PAUL COVERDELL	Customer Type.: 1 LOCAL
Customer Name...: NAT'L RIGHT TO LIFE PAC	SalesRep.....: 5 JEFF SMITH
Address Line 1.: 1847 WEXFORD WAY	Product Code...: 90 POL/
Address Line 2.:	Finance Charge: None
City/St/Zip....: ORANGE PARK, FLA 32073	Discount Taken: 0.00%
Contact/Phone...: MARJORIE HIGGINS/269-1928	Affidavit Type: 3 D & T w/notary
Taxes: 1 -	2 -
	3 -

## Last Statement

## ++ Current ++

Prev Bal..	0.00	Sales.....:	0.00	0.00
Total A/R:	0.00	Payments.....:	0.00	0.00
0 - 30..:	0.00	Discounts.....:	0.00	0.00
31 - 60..:	0.00	Adjustments.....:	0.00	0.00
61 - 90..:	0.00	Finance Charges:	0.00	0.00
91 - 120..:	0.00	Sales Tax.....:	0.00	0.00
120 + ...:	0.00	Balance.....:	0.00	0.00
Date last Charge * Payment 11/27/92 * 11/23/92				

Press: P to Print Screen, F1 for History, Any Other Key to Continue.